

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	Bankruptcy Case No. 21-21712-CMB
Eustace O. Uku,	Chapter 13
Debtor,	Related Documents 189, 210
Home Buyers of PGH, LLC,	
Movant,	
vs.	
Charles A. Knoll, Jr., Municipality of Penn Hills, Penn Hills School District, County of Allegheny, Mellon Bank Community Development, PNC Bank National Association and Ronda J. Winnecour, Trustee,	
Respondents	

MOTION FOR RECONSIDERATION OF ORDER
PERMITTING SALE OF REAL PROPERTY FREE AND
CLEAR OF ALL LIENS AND ENCUMBRANCES

And now, Home Buyers of PGH, LLC, by its attorney, Mitchel Zemel, Esq., files this Motion for Reconsideration of Order Permitting Debtor's Amended Motion to Sell Real Property Free and Clear of All Liens and Encumbrances (the "Sale Motion") and in support states the following:

1. Movant filed an objection to Debtor's request to proceed with the sale of property located at 8260 Chaske Street, Verona, PA 15147 (the "Property").
2. Movant is the buyer under an agreement of sale for the Property dated August 15, 2022.
3. The Court conducted a hearing on Debtor's motion March 23, 2023.
4. Following the hearing, Debtor's motion was approved by the Court.

5. Undersigned counsel for Movant, a solo practitioner, was unable to attend the hearing due to a recurring illness, and could not notify the Court in advance that he would be unable to attend the hearing.

6. The purchase agreement for the Property expired and was terminated by Movant prior to the hearing.

7. The Property has significantly deteriorated since the agreement to purchase the Property was entered into as a result of the lack of maintenance and protection from waste, including a hole in the roof that has permitted water to enter the Property for an extended period of time.

8. Movant will be severely prejudiced if its counsel is not provided an opportunity to argue against approval of the sale.

Wherefore, Movant respectfully requests this Court withdraw its order of March 23, 2023 approving the sale and schedule a hearing on the matter.

Respectfully submitted,
MITCHEL ZEMEL, ESQ., LLC

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